

**From:** [PETERSON Jenn L](#)  
**To:** [ANDERSON Jim M](#); [Eric Blischke/R10/USEPA/US@EPA](#)  
**Subject:** RE: RI/FS Issue Summary  
**Date:** 03/16/2009 09:32 AM

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*My comments are provided below in blue italics.*

*-Jennifer*

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**From:** ANDERSON Jim M  
**Sent:** Friday, March 13, 2009 4:01 PM  
**To:** 'Blischke.Eric@epamail.epa.gov'; PETERSON Jenn L  
**Subject:** RE: RI/FS Issue Summary

Eric,

During the 3/11 TCT, we asked if we could respond to your 3/9 e-mail below by COB Mon 3/16. Yesterday you urged me to get you comments ASAP, & I told you I'd get you comments today. I may have promised you something I can't deliver. Sorry.

Jennifer P generated most of DEQ's 3/5 comments, & Jennifer isn't in & won't be in until Mon 3/16. During the TCT mtg, I asked Jennifer if she could respond to your 3/9 e-mail on Mon 3/16 & she said she could. I added my comments to your e-mail below (see *italic red* text), but I ask you to hold off talking to the LWG until Jennifer gets you her comments on 3/16. I generally restricted my comments below to those comments DEQ submitted in our 3/5 e-mail.

Jim

-----Original Message-----

**From:** Blischke.Eric@epamail.epa.gov  
[<mailto:Blischke.Eric@epamail.epa.gov>]  
**Sent:** Monday, March 09, 2009 4:37 PM  
**To:** Shephard.Burt@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov; Davoli.Dana@epamail.epa.gov; GAINER Tom; Grepo-Grove.Gina@epamail.epa.gov; PETERSON Jenn L; jeremy\_buck@fws.gov; ANDERSON Jim M; Goulet.Joe@epamail.epa.gov; Smith.Judy@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; MCCLINCY Matt; POULSEN Mike; Fuentes.Rene@epamail.epa.gov; Robert.Neely@noaa.gov; Sheldrake.Sean@epamail.epa.gov; tomd@ctsi.nsn.us; csmith@parametrix.com; rgensemer@parametrix.com; rose@yakama.com; erin.madden@gmail.com; jay.field@noaa.gov; Cora.Lori@epamail.epa.gov; Ader.Mark@epamail.epa.gov; audiehuber@ctuir.com; Lisa.Bluelake@grandronde.org;

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Subject: RI/FS Issue Summary

On February 6, 2009, the LWG submitted a summary of the resolution of

RI/FS issues. This list is based on EPA comments submitted on the Round

2 Report. Below is an assessment of the RI/FS issue summary is but here

is my assessment based on my review and comments received to date (DEQ,

Chip, Dana, Eco team). These are issues that are either not presented

accurately, require clarification or are unresolved in the LWG's

2/6/2009 RI/FS Issue Resolution Table. I would like to go through this

list, as well as any other concerns, at this week's TCT.

Issue number 4 - The language presented in the table is inaccurate.

Consistent with the problem formulation, EPA requires evaluation of TZW

relative to water TRVs in the BERA. This is more than a screening step

as described here. Evaluation of TZW relative to water TRVs is a line

of evidence for the BERA.. *I'm not sure you Jennifer are talking about the same thing. I think both Jennifer & I read the LWG's Issue # 4 as mainly dealing with John T's argument about benthic*

*organisms shielding/isolation to TZW. I think you're focusing on whether this is a screening step or a LOE in the BERA. Both Jennifer & I think we shouldn't allow the LWG to factor this shielding/isolation into the risk assessment, but are OK with the LWG talking about it in the uncertainty section. I think the LWG is OK with that too.*

*I think Eric's comment reflects my comment, because the LWG is assuming any risk assessment that does not incorporate "shielding" represents a screening level risk assessment. My comment was that comparison to the full concentration (no screening) should be considered a baseline assessment, not a screening level risk assessment.*

Issue number 7 - It needs to be clarified that any estimation of exposure point concentrations (EPCs) must match the scale of the receptor. *I agree, & your comment reflects Jennifer's comment.*

*I do not think the comment reflects my initial comment. The issue is the initial and refined screening steps, not the estimation of exposure point concentrations. LWG presented their proposal for the initial and refined screening steps in a flow diagram provided to EPA on 4/14/08 (as indicated by the table). Since this flow diagram is a revision to the problem formulation, it should be reviewed by the project team – esp. since a revised problem formulation has not been made available. The 4/14/08 version of the flowchart showed a refined screening step which utilized a 95% UCL on site-wide sediment concentrations, applicable to all receptors. Again, the simplest way to ensure we are in agreement is to circulate the revised problem formulation flow chart for review.*

Issue number 11 - Based on the language presented in the table, it is

unclear whether the LWG will be screening TZW against Region 6 tap water

PRGs. This needs to be clarified. *I think this is Dana D's comment. Eric, I agree with your comment..., it isn't clear whether the LWG intends to screen TZW against MCLs & tap water PRGs. However, the LWG clearly states that they intend to estimate the surface water concentrations loaded by TZW discharge & screen the surface water against MCLs & tap water PRGs. Since our exposure model doesn't consider that TZW would be withdrawn for drinking water sources..., I don't understand why we're pushing the LWG to screen TZW against MCLs & tap water PRGs.*

Issue number 12 - The language presented in the table is inaccurate.

EPA did not agree that the evaluation of TZW as a source of contaminants

in biota is no longer required. EPA agreed to rely primarily on tissue

data for the evaluation of human health risks in the HHRA. However, EPA

also requires the evaluation of TZW relative to fish consumption AWQC as

a line of evidence in the HHRA and for the purpose of evaluating the contribution of TZW to biota tissue.

Issue number 22: Clarification of which data falls into which data set

(e.g., site wide vs. RM 1 - 2). *I agree, & I think your comment reflects Jennifer's comment.*

*There should be clarification, but after we get the information I hope there is also time to comment on their designations.*

Issue number 26: Although the table states that the LWG will estimate

background levels as directed by EPA on 9/19/2009, the table also states

that a second set of background values will be developed without exclusion of statistical outliers unless EPA provides credible evidence

that the outliers are affected by specific CERCLA-like sources(s).

Further clarification on how this information will be presented and what

is meant by "EPA provides credible evidence."

Issue number 29: TRVs should be resolved.

Issue number 31: Use of FPM: This may be a check-in topic or

should be

a focus of the draft RI and BRA review. *I'll wait for Jennifer to weigh-in on this one.* There should be not only a check in, but written agreement on model parameters (e.g. acceptable false negative, false positive, predicted no-hit and predicted hit reliability in addition to which COIs are to be included in the model (e.g. TPH, PAHs, both?). In addition, the model is extremely sensitive to initial conditions for the false negative starting point, which will require coordination to ensure appropriate results. The alternative is that we accept that we have no idea what we are getting in a model, and an understanding that it may have to be completely re-worked after review. All model runs of all endpoints should be submitted with the report in electronic format for review.

Issue number 38: EPA agreed to not include the breast feeding scenario

in the draft HHRA. Pending resolution of this scenario, it will be included in the final HHRA. *I agree with your comment.*

Issue number 45: Development of AOPCs will proceed as planned culminating with AOPC check-in on May 27 and 28. *I agree with your comment.*

Issue number 51: There appears to be agreement regarding the need to

consider upland sources of contamination in the CSM (connect the dots).

During the last management meeting, it was agreed that a strict screening of upland data will not be performed but that a semi-quantitative evaluation of the magnitude of upland contamination

will be presented in the RI and that a quantitative evaluation would be

performed in the FS. *I agree with your comment.*

Issue number 55: I believe it was agreed that the application of 1/2

the detection limit applies on a media specific basis (responds to comment from DEQ). *I agree, & I think your comment reflects Jennifer's comment. Data rules for human & eco risk assessments should be the same & the ½ DL should be applied on a media-specific basis.*

*This comment should be specific that the application of ½ detection limit for the ecological data rules is media specific.*

In addition to the above items, there are a number of issues where further discussion is required:

Issue letter E: Evaluation of TZW in context of in-water remedy and upland source control measures. Point of compliance issues aside, this

is really a question of how the FS will consider the effectiveness of

source control.

Issue number 8: Application of WOE: This will need to be addressed through the early RI review and FS scoping steps. *I'll wait for Jennifer to weigh-in on this one.*

*What is the agreement on how are they weighting lines of evidence in the RI report? Are they following our proposal and then discussing in the uncertainty section? Do they have an alternative proposal? I would like to know what to expect in the report.*

Issue number 16: Upland Site Summary Issues: This issue is resolved

(see email regarding Table 5.1-2)

Issue number 27: Hilltopping Replacement Values: AOPC Check-in. Use

of GIS tool will allow a range of values to be considered (e.g., background, baseline, sediment trap results, upper study area bedded

sediments, etc.)

Issue number 39: Schedule and PRGs: Probably still an ongoing discussion. See the most recent FS Milestone table for the latest version of the schedule.

Issue number 41 - Benthic Toxicity PRGs: AOPC Check-in. Feeds into the

WOE evaluation.

Issue number 42: Fish and Shellfish SWAC goals and hilltop values: AOPC Check-in.

Issue number 43: Surface Water PRGs: RAO and ARAR POC discussion.

Issue number 44: TZW PRGs: RAO and ARAR POC discussion.

Issue number 50: Clarify that after the range is evaluated, the best

performing degradation rate will be used.

Issue number 52: AWQC as PRGs and/or ARARs: RAO and ARAR POC discussion.

Issue number 57: The language in the table does not provide sufficient

detail. Need to clarify that the agreement was to use data from RM 16

and consider data from RM 11 (not including east side) in the evaluation

of upstream surface water concentrations. However, chemistry and flow

data at specific locations may also be considered in the RI.

Issue number 59: Comparison of background distributions: AOPC Check-in.

Issue letter A: Pipeshed information: Resolved